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8 Attorneys for Plaintiff

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 10 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
 11 **WESTERN DIVISION**

12 GOOD MORNING TO YOU)
 PRODUCTIONS CORP., *et al.*,)

13 Plaintiffs,

14 v.

15 WARNER/CHAPPELL MUSIC,)
 16 INC., *et al.*)

17 Defendants.)

) Case No. CV 13-04460-GHK (MRWx)

) **NOTICE OF MOTION AND MOTION**
) **FOR ORDER: (i) COMPELLING**
) **DEFENDANTS TO PRODUCE**
) **WITHHELD DOCUMENTS; OR (ii)**
) **RELIEF FROM DISCOVERY**
) **CUTOFF TO CONDUCT COURT**
) **REVIEW *IN CAMERA* OF**
) **WITHHELD DOCUMENTS**

) Date: June 25, 2014
) Time: 9:30 A.M.
) Judge: Mag. Michael R. Wilner
) Room: H-9th Floor
) Disc. Cutoff: June 27, 2014
) Pretrial Conf.: N/A
) Trial Date: N/A
) L/D File Jt. MSJ: 11/14/14
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1 **TO THE COURT, ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS**
2 **OF RECORD:**

3 **PLEASE TAKE NOTICE** that on June 25, 2014, at 9:30 a.m., or as soon
4 thereafter as this matter may be heard before the Honorable Magistrate Michael R.
5 Wilner in Courtroom H-9th Floor of this Court, located at 111 N. Spring Street, Los
6 Angeles, California, plaintiffs Good Morning To You Productions Corp., Robert
7 Siegel, Rupa Marya d/b/a Rupa & The April Fishes, and Majar Productions, LLC
8 (“Plaintiffs”), will, and hereby do, move this Court pursuant to Federal Rule of Civil
9 Procedure 37 for an order: (i) compelling defendants Warner/Chappell Music, Inc.
10 and Summy-Birchard, Inc. (“Defendants”) to produce all documents improperly
11 withheld and identified in its deficient privilege log either on the basis of attorney-
12 client privilege or attorney work product doctrine; or in the alternative (ii) for relief
13 from the discovery cutoff deadline of June 27, 2014 so this Court may conduct an *in*
14 *camera* review and inspection of purportedly privileged documents (the “Motion”).

15 This Motion is based upon this notice of motion, the parties’ Local Rule 37-2
16 Joint Stipulation, the declaration of Betsy C. Manifold in Support of Plaintiffs’
17 Motion, all pleadings, discovery, memorandum of points and authorities,
18 supplemental memoranda of law, oral or documentary evidence proffered in support
19 thereof, arguments of counsel, and any other matters as the Court deems proper.

20 This Motion is made following the conference of counsel pursuant to Local
21 Rule 37-1 which took place on May 22, 2014.

22 Respectfully submitted,

23 Dated:

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

24 Bv: /s/Betsy C. Manifold
25 BETSTY C. MANIFOLD

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